

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

Case No. 1:19-cr-10080-NMG

GREGORY COLBURN et al.,

Defendants

**DEFENDANT JOHN WILSON'S OBJECTIONS TO
GOVERNMENT'S PROPOSED EXHIBITS**

Pursuant to the Court's order on August 9, 2021 (ECF No. 2054), Defendant John Wilson respectfully submits his objections to the government's proposed exhibits (ECF No. 1925), attached as Exhibit A.

Wilson notes that, as he has explained to the government, many of his objections may be able to be resolved if the parties can reach a reciprocal agreement on admissibility similar to the one Defendants proposed to the government on August 2, 2021. Wilson remains willing to discuss such a stipulation and hopes the parties will be able to reach an agreement that would be able to address wholesale many of the parties' objections.

Wilson reserves the right to rely upon the objections asserted by any other Defendant as to any proposed exhibit. Wilson further reserves the right to withdraw or assert additional objections to any proposed exhibit, including if the government fails to call a witness and lay a proper foundation for any proposed exhibit. Wilson also maintains, and does not waive, his objection to the government's use of any documents the government obtained via its illegal search warrant.

Dated: August 12, 2021

Respectfully submitted,

Counsel to John Wilson,

/s/ Michael Kendall

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CERTIFICATE OF SERVICE

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorney of record.

/s/ Michael Kendall
Michael Kendall